

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

GBC Metals, LLC d/b/a Olin Brass
305 Lewis and Clark Boulevard
East Alton, Illinois 62024

ATTENTION:

Keith Pontow, P.E.
Sr. Environmental Engineer

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring GBC Metals, LLC (GBC or you) to submit certain information about the facility at 305 Lewis and Clark Boulevard, East Alton, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within **30 calendar days** after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

GBC owns and operates an emission source at East Alton, Illinois. We are requesting this information to determine whether your emission source is complying with the requirements for any CAA permit, the Illinois State Implementation Plan, and any applicable CAA regulations.

GBC must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

GBC must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

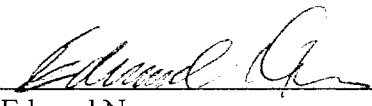
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject GBC to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Sarah Clark at 312-886-9733.

Date

4/30/18


Edward Nam

Director

Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, and/or Standards of Performance for Secondary Brass and Bronze Production Plants at 40 C.F.R. Part 60, Subpart M..

1. The term “casting units” includes all furnaces and casting units constituting the #1 and #2 Ascast Casting Units and the #1 through #5 D.C. Casting Units identified in the Title V Permit No. 07110030.
2. The terms “document” and “documents” and “documentation” means any object that records, stores, or presents information, and includes: email; writings; memoranda; contracts; agreements; records; or information of any kind, formal or informal, whether handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy. All documents in hard copy shall also include attachments to or enclosures with any document.
3. The term “emission testing” includes, but is not limited to, compliance testing, engineering testing, and testing for general information.
4. The term “GBC” or “you” or “your” includes, but is not limited to: GBC Metals LLC, Global Brass and Copper Holdings, Inc., d/b/a Olin Brass, or any assumed business names, agents, representatives, employees, contractors, or other entities that performed work or acted in any way on behalf of, are related to, or acted at the direction of GBC Metals LLC.
5. The term ‘present’ means the date of receipt of this request.

Appendix B

Information You Are Required to Submit to EPA

GBC Metals, LLC must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). All questions refer to the facility located at 305 Lewis and Clark Boulevard, East Alton, Illinois (Facility):

1. Provide a copy of all final air construction permit(s), finalized since April 1, 2008, related to the Casting Units and their associated air pollution controls.
2. Provide a copy of Permit ID 05030067, referenced in Exhibit 215-1 of "CAAPP Permit Renewal Application (Permit No. 07110030)" sent to IEPA on April 26, 2012.
3. Provide copies of your annual emissions report (AER), semi-annual monitoring (SAM) reports, and annual compliance certification for 2016 (and 2017 when completed and submitted to IEPA). For each calendar year provide the following information:
 - a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used; and
 - b. Any documents outlining procedures for calculating annual emissions.
4. Provide the most current potential to emit calculations, with dates the calculations were performed, pertaining to hazardous air pollutant (HAP) and particulate matter (PM) emissions from the Hot Mill, #2 Coil Miller, #3 Coil Miller, and individual Casting Units.
5. If not included in the responses to Requests #4 or #5, provide copies of all documentation, analyses, and calculations (analyses) performed to determine the concentration and identity of HAPs that constitute PM emissions from the Casting Units and associated air pollution control equipment for the following: (i) the analyses referenced on page 2 of Exhibit 260-5 of the Facility CAAPP permit application completed on October 30, 2007 and submitted to EPA (in response to a request for information) on March 29, 2016 under the filename "Title V Application_East Alton - 2007.pdf", and (ii) all analyses completed from April 1, 2013 to the present.
6. Provide a copy of all technical data sheets and/or material specification sheets for the Rayco Synthetic Scalper Oil -4812.
7. As per Section 2.1.9 of Construction Permit No. 00080019, provide the capacity of the #2 and #3 Coil Millers, in pounds per hour, with supporting documentation. Specify each capacity as based on the incoming weight, exit weight, or weight after milling.
8. Provide the production hours, production quantity in pounds, and production rate in pounds per hour for the for the Coil Miller #2, Coil Miller #3, and Hot Mill, from March 1, 2016, to the present, in an **unlocked, Excel-compatible electronic spreadsheet**. Identify each weight as incoming, exit, after milling, before rolling, *etc.*

9. For each individual Casting Unit, from April 1, 2008 to the present, provide the following information in an **unlocked, Excel-compatible electronic spreadsheet**:
- a. Number and capacity of all melt furnaces and holding furnaces;
 - b. Amount of material retained in each furnace after casting and/or collected as skimmings to reclaim;
 - c. List all material inputs, specifying each material's chemical composition, function (*e.g.*, "mold cover material," "charge," *etc.*), and source;
 - d. List all alloys cast and the elemental composition of each alloy in weight percent;
 - e. Hours of operation each month;
 - f. Tons of charge each month;
 - g. Tons of material input, if different from charge (*e.g.*, mold cover material), each month; and
 - h. Tons of each individual alloy cast each month.
10. Provide a copy of any current Compliance Assurance Monitoring (CAM) plans that relate to any Casting Unit and the # 3 Coil Miller. If a CAM plan has been revised within the past five years, also provide copies of any previous versions dating back to April 1, 2013.
11. For each air pollution control unit and air ducts associated with each Casting Unit and the #3 Coil Miller, from April 1, 2013 to the present, provide information, in an **unlocked, Excel-compatible electronic spreadsheet**, and/or records for the following:
- a. Date(s) when the air pollution control unit was installed and/or replaced;
 - b. Operating parameter(s) monitored and the monitoring frequency;
 - c. Date(s) when monitoring instrumentation were calibrated or replaced;
 - d. Monitored operating parameter range, the method used to establish the values (reference design evaluation, performance test, *etc.* as applicable), and the effective date of these operating limits;
 - e. Monitored operating parameter data;
 - f. For all deviations, exceedances, malfunctions, or downtime not included in the SAM reports, provide the date(s), duration, and explanation for the cause of the incident and a timeline and description for any corrective action taken; and
 - g. Copies of all manufacturer specifications and recommended operating and maintenance procedures.

12. Provide copies of all documents including, but not limited to, any studies, assessments, inspections, and/or evaluations regarding the ventilation, capture, and/or collection of air emissions from one or more Casting Units conducted for any reason from April 1, 2008 to the date of this request.
13. For all emissions tests, conducted for any reason, on any Casting Unit, #2 Coil Miller, #3 Coil Miller, and any associated air pollution control equipment, completed since April 1, 2013, provide the following. You do not need to submit the tests conducted July 12-15, 2016 in response to the EPA 114 Request for Information.
 - a. **List:** Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (e.g., before or after emission unit or air pollution control device), and the feed/charge or other process weight rate, specifying to the extent possible whether the rate represents the process weight before or after processing. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with IEPA.
 - b. **Copies:** Provide a copy of the full emissions test report, including any summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
14. If any air pollution control equipment associated with a Casting Unit has not been tested since April 1, 2013, provide the most recent PM stack test report, as per condition 4.1.2(b)(ii)(G)(II) of CAAPP I.D. No. 119020ABG issued August 11, 2016.
15. Provide copies of all visible emission observations and opacity readings performed from April 1, 2013 to the present for the roof vents, stack(s), and/or air pollution control equipment exhaust(s) associated with the Hot Mill, #2 Coil Miller, #3 Coil Miller, and Casting Units. You do not need to submit the Method 9 readings conducted July 12-15, 2016 in response to the EPA 114 Request for Information.
16. From April 1, 2008 to the present, list with dates and descriptions all capital appropriations requests over \$100,000 related to the Casting Units.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

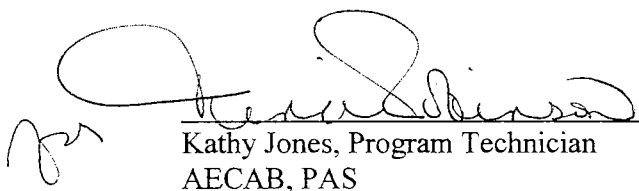
Keith Pontow, P.E., Sr. Environmental Engineer
GBC Metals, LLC d/b/a Olin Brass
305 Lewis and Clark Blvd.
East Alton, Illinois, 62024

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-mail to:

Julie Armitage
Chief, Bureau of Air,
Julie.Armitage@Illinois.gov

On the 1st day of May 2018.


Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70150640000459656196